

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110  
NEW YORK, NEW YORK 10118  
TEL (212) 763-0883 | FAX (212) 564-0883  
WWW.KAPLANHECKER.COM

DIRECT DIAL 929.294.2545  
DIRECT EMAIL mmiller@kaplanhecker.com

May 5, 2021

## **VIA ECF**

The Honorable Ann M. Donnelly  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 4G | Chambers N 415  
Brooklyn, New York 11201

*Re: United States v. Cho*, No. 21-cr-0040 (AMD)

Dear Judge Donnelly:

We represent Bryan Cho in the above-captioned proceeding and write to request an adjournment of the deadline for the filing of Mr. Cho's motions, currently scheduled for May 10, 2021. We respectfully request that the deadline be adjourned five weeks and set for June 14, 2021 and that the existing deadlines for the Government's response to Mr. Cho's motions and Mr. Cho's reply be similarly extended five weeks, to July 2, 2021 and July 13, 2021, respectively. The Government consents to this request.

The Government is in the process of producing materials in response to our discovery requests. Because these materials may be relevant to certain motions we are considering filing, an adjournment is necessary to allow the Government to produce them, and to provide us with sufficient time to review them, in advance of any motion practice. In addition, the parties are actively engaged in discussions concerning a possible pre-trial disposition in this matter, which, if successful, could resolve this case without the need for motions.

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There has been no previous request for adjournment or enlargement of the motion deadlines in this case.

Respectfully submitted,

/s/ Marshall L. Miller

Marshall L. Miller

Shawn G. Crowley

Andrew L. Chesley

KAPLAN HECKER & FINK LLP

350 Fifth Avenue, Suite 7110

New York, New York 10118

Telephone: (212) 763-0883

mmiller@kaplanhecker.com

scrowley@kaplanhecker.com

achesley@kaplanhecker.com

*Counsel for Bryan Cho*

cc: (by ECF)

Assistant United States Attorneys Elizabeth Geddes and Turner Buford